

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**ASHLEY ROBERTS and ,
TIFFANY TAYLOR Individually and
on Behalf of All Those Similarly Situated
Plaintiff,**

vs.

**PROFESSIONAL CASE MANAGEMENT
SERVICES OF AMERICA, INC.,
and TONI BRANDON, Jointly and Severally
Defendants.**

**CIVIL ACTION CASE NO.:
1:17-CV-04217-ELR**

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOW COMES, Tiffany Simmons, Counsel of Record for Defendants in the above-styled matter, and moves this Court, pursuant to Local Rule 83 for an Order permitting her to withdraw as Counsel of Record for Defendants in the above-styled matter and for grounds thereof shows this Honorable Court the following, to wit:

1.

That Tiffany Simmons has notified the client pursuant to local rules of her intentions to withdraw. Defendants are aware and consent that Karla Walker will remain as lead and sole counsel for Defendants.

2.

That Tiffany Simmons be permitted to withdraw as Counsel because the parties and lead counsel have agreed to allow counsel to withdraw.

3.

The case will not be delayed nor will the parties suffer any prejudice if counsel is allowed to withdraw.

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Counsel has timely notified Defendants of her intent to withdraw from this action.
This the 5th day of March, 2018.

Respectfully Submitted

s/TIFFANY SMMONS
/s/ Tiffany Simmons
State Bar No. 112667
Attorney for Defendants
P.O. Box 191274
Atlanta, GA 31119

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I am counsel for the defendant and I have this date served a copy of the within and foregoing Motion for Leave to Withdraw as Counsel with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record

BRANDON A. THOMAS

The Law Offices of Brandon A. Thomas, PC
1800 Peachtree Street, N.W., Suite 300
Atlanta, GA 30309

Professional Case Management Services of America

c/o Karla Walker lead counsel
104 East Adair Street
P.O. Box 1810
Valdosta, GA 31603

This the 5th day of March, 2018.

s/TIFFANY SMMONS

/s/ Tiffany Simmons

State Bar No. 112667

Attorney for Defendants

P.O. Box 191274

Atlanta, GA 31119

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NOTICE OF WITHDRAWAL

**TO: Professional Case Management Services of America
c/o Karla Walker lead counsel
104 East Adair Street
P.O. Box 1810
Valdosta, GA 31603**

NOTICE IS HEREBY GIVEN AS REQUIRED THAT:

- A. Attorney Tiffany Simmons wishes to withdraw from further representation in your case;
- B. The United States District Court, Northern District of Georgia, Atlanta Division will still retain jurisdiction over your case;
- C. You have consented to the Motion and must keep remaining counsel and if so required the Clerk of the Atlanta Division of the United States District Court, Northern District, informed as to where to mail all future notices, pleadings or other papers in connection with your case;
- D. If attorney Tiffany Simmons is permitted to withdraw from your case, then

it will be your obligation to cooperate with the remaining counsel in the defense of your case.

E. If you fail or refuse to do these things, your case may suffer adversely including, but not limited to, having your case dismissed;

F. Service of all notices, pleadings, etc. will be made on the other attorney that represents you when this withdrawal becomes effective. You should pay attention to all such documents.

G. Dates of any scheduled proceedings including trial will not be affected by the withdrawal of counsel;

H. You have consented to this withdrawal. In the event that your consent is withdrawn, you must object within 14 days of the date of this notice.

This the 5th day of March, 2018.

s/TIFFANY SMMONS
/s/ Tiffany Simmons
State Bar No. 112667
Attorney for Defendants
P.O. Box 191274
Atlanta, GA 31119

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing **NOTICE TO WITHDRAW** by depositing a true copy of same in the U.S. Mail in a properly postage prepaid envelope to insure delivery thereof to:

BRANDON A. THOMAS

The Law Offices of Brandon A. Thomas, PC
1800 Peachtree Street, N.W., Suite 300
Atlanta, GA 30309

Professional Case Management Services of America

c/o Karla Walker lead counsel
104 East Adair Street
P.O. Box 1810
Valdosta, GA 31603

This the 5th day of March, 2018.

s/TIFFANY SMMONS

/s/ Tiffany Simmons
State Bar No. 112667
Attorney for Defendants
P.O. Box 191274
Atlanta, GA 31119